

JUSTICE FIRST, LLP
Jenny C. Huang, SBN 223596
Nadia Aziz, SBN 252966
2831 Telegraph Avenue
Oakland, CA 94609
Telephone: (510) 628-0695
Fax: (510) 272-0711
E-mail: jhuang@justicefirstllp.com
naziz@justicefirstllp.com

JIVAKA CANDAPPA, SBN 225919
46 Shattuck Square, Suite 15
Berkeley, CA 94704
Telephone: (510) 981-1808
Fax: (510) 981-1817
E-mail: jcandappa@sbcglobal.net

Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,

Plaintiff,

vs.

JASON INGRASSIA, individually and in
his official capacity; COUNTY OF
CONTRA COSTA; and CITY OF
SAN RAMON.

Defendants.

Case No.: Case No. CV-07-02669 (CRB)

**NOTICE OF PLAINTIFF'S
MOTION TO FILE EXPEDITED
MOTION TO COMPEL RESPONSES TO
1ST SET OF DISCOVERY REQUESTS ON
DEFENDANT INGRASSIA**

Date: August 22, 2008

Time: 10:00 a.m.

Honorable Charles R. Breyer

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Abhinav Bhatnagar hereby moves the Court for
an order permitting Plaintiff to file an expedited motion to compel responses to Plaintiff's 1st Set
of Discovery Requests on Defendant Ingrassia. This motion is made pursuant to Fed.R.Civ.Pro.

26(b)(1) and Civil Local Rules 6-1 and 6-3 and is based upon the accompanying declaration of Plaintiff's counsel, Jenny Huang.

Dated: July 26, 2008
Oakland, California

JUSTICE FIRST, LLP

Attorneys for Plaintiff Abhinav Bhatnagar

By:

/s/ Jenny Huang

Jenny C. Huang
2831 Telegraph Avenue
Oakland, CA 94609
Tel.: (510) 628-0695

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,)
Plaintiff,) Case No.: Case No. CV07-02669 (CRB)
vs.)
JASON INGRASSIA, individually and in)
his official capacity; COUNTY OF) **PROOF OF SERVICE**
CONTRA COSTA; and CITY OF)
SAN RAMON.)
Defendants.)

I, Jenny Huang, hereby declare as follows:

1. I am a citizen of the United States of America over the age of eighteen years. My business address is 2831 Telegraph Avenue, Oakland, California, 94609. I am not a party to this action.

2. On July 26, 2008, I served by electronically filing a true and correct copy of the **Notice of Plaintiff's Motion to File Expedited Motion to Compel Responses to Plaintiff's 1st Set of Discovery Requests on Defendant Ingrassia, the Declaration of Jenny Huang and Plaintiff's Proposed Order** to the following parties:

Mr. Gregory Harvey
Counsel for Municipal Defendants
Asst. County Counsel
Contra Costa County
651 Pine Street, 9th Floor
Martinez, CA 94553

Mr. James Fitzgerald, III
Counsel for Defendant Ingrassia
McNamara Dodge et al. LLP
P O Box 5288
Walnut Creek, CA 94596-1288

I declare under penalty of perjury the foregoing is true and correct.

Date: July 26, 2008
Oakland, California

/s/ Jenny Huang
JENNY C. HUANG